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ABSTRACT

The issue of academic fraud is addressed in a transcript from a three-part series entitled "Degrees for Sale" from the "Donahue on Today" television show, and two essays drawn from presentations at the 1981 annual conference of the American Association of State Colleges and Universities. The essays are "Stopping Fraud and Ensuring Quality," by Lyn Gubser, and "Quality on Campus: Whose Responsibility?" by Richard M. Millard. The "Donahue on Today" segments concern mail-order degrees by accredited and nonaccredited institutions, responsibility for accreditation, and related legal and ethical issues. The interviewees in the segments were Lyn Gubser, Vannoy Thompson, and Richard Crews. The first essay concerns regulation of fraudulent and marginal institutions and degree-granting practices. Unprecedented challenges in educational quality control are foreseen in this technological age. The second essay addresses the question of who is responsible for educational quality control, and suggests that institutions and administrators, not accrediting agencies, should be. To strengthen accreditation and the credibility of the academic community, academe can do five things: (1) stop treating accrediting agencies as sources of harassment; (2) make self-study and peer review an integral part of ongoing self-assessment; (3) maintain consistency and support of agencies' work; (4) avoid selective use of accreditation process results; and (5) help make faculties, trustees, students, alumni, legislators, and the general public more aware of accreditation's role. (MSE)

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ACADEMIC FRAUD: A THREAT TO QUALITY

Lyn Gubser, Director
National Council for Accreditation of Teacher Education

Richard M. Millard, President
Council on Postsecondary Accreditation

AASCU STUDIES 1982/1

April 1982

Allan W. Ostar
President

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FOREWORD

Higher education has come under increasing attack by all sectors of society because of its inattention to the proliferation of fraudulent institutions and academic programs. With declining financial resources and diminishing enrollments, institutions of high quality can no longer tolerate the pervasiveness of such fraud. In short, the acquisition of invalid credentials jeopardizes legitimate institutions and the credentials they award.

Who then is responsible for stopping this proliferation? The obvious answer is those of us who are in the higher education community. We must take steps to ensure the integrity of all educational programs and institutions.

We, however, are often so involved in the day-to-day concerns of our own institutions that we fail to pay adequate attention to those external abuses, which can nonetheless have a very negative impact on our individual institutions. While recognizing that we share responsibility with such groups as accrediting agencies, those of us who occupy key positions of institutional leadership must urge state governmental authorities to develop and enforce legal restrictions to curtail fraudulent practices.

In March 1981 I saw a three-part television series, entitled "Degrees for Sale," that appeared on NBC's *Donohue on Today* show. Lyn Gubser, Director of the National Council for Accreditation of Teacher Education (NCATE) was a key participant in the series, which focused on the easy acquisition of degrees from fraudulent, nonaccredited institutions. This discussion alerted me to an issue that I felt was not being adequately addressed by AASCU institutions. How pervasive were these programs and institutions? What effect do they have on our institutions?

The series sparked the idea for a session at the 1981 AASCU Annual Meeting. Papers included in this publication are drawn from presentations by Dick Millard, President of the Council on Postsecondary Accreditation (COPA), and Lyn Gubser, to whom we are grateful for their concern about this issue their willingness to participate in the session, and their permission to include the texts of their speeches. We would also like to extend our appreciation to the *Donohue on Today* staff for permitting us to use their materials in the session and to reprint them in this text.

The following presentations, I believe, demonstrate the need to pay closer attention to higher education practices and licensure laws in your own state.

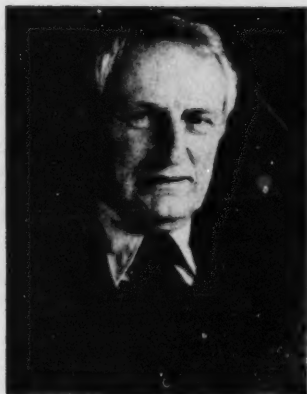
Robert L. Ewigleben
Chair, AASCU Committee on Accreditation
President, Ferris State College

ABOUT THE AUTHORS



Dr. Lyn Gubser is executive director of the National Council for Accreditation of Teacher Education (NCATE), which represents a major professional forum dedicated to the improvement of quality in professional education. As executive director, Dr. Gubser supervises scheduled evaluations of professional programs at some 600 American colleges and universities and is responsible for reviewing legal procedures and for ensuring due processes for those institutions evaluated that are denied NCATE accreditation.

Receiving his Ph.D. in 1968 from the University of Oregon's Center for the Advanced Study of Educational Administration, Dr. Gubser had been a classroom teacher of history and social studies at both high school and community college levels.



Dr. Richard M. Millard is the president of the Council on Postsecondary Accreditation (COPA). Dr. Millard has had a long-standing involvement in accreditation issues, most recently as the director of the Department of Postsecondary Education of the Education Commission of the States. Prior to joining ECS, he was the first chancellor of the Board of Higher Education for the Commonwealth of Massachusetts.

Dr. Millard was born in Tennessee and grew up in Indiana, where he received his baccalaureate from DePauw University. Subsequently, he received his Master's and Doctoral degrees from Boston University, where he later served as Chairman of the Philosophy Department, Acting Dean of the Graduate School, and Dean of the College of Arts and Sciences.

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DEGREES FOR SALE¹

Phil Donahue on NBC's *Today Show*

In March of 1981, Phil Donahue broadcast a three-part series on NBC's *Today Show* in which were examined issues of academic fraud in higher education. This series was developed in cooperation with the National Council for Accreditation of Teacher Education (NCATE) Director Lyn Gubser, who appeared with Donahue in each of these broadcasts. The following is a transcript of "Degrees for Sale."

Part I

Donahue: The issue of degrees for sale is hardly a new one, but it has become a more important issue because of the increasing number of so-called "nontraditional" educational institutions in this country offering a myriad of degrees—both baccalaureate and postgraduate degrees—via the mail, with the work sometimes being done or reviewed on the phone.

Who is watching these universities? And who is watching the agencies which are charged with accrediting them? And are the degrees really any good? And if they are, from what institution are they good? And are all of them good? Well, not all of them are good, as recent incidents have shown. In fact, one in Arizona has been closed down.

A college degree can qualify you not only for a better job but for a promotion as well—more money. You can get one, or at least a catalogue that tells you how to get one, via the mail for \$19.95. We did. We sent the money in, and we got both of these

¹Published with the permission of *Donahue on Today* Multimedia Program Productions, Inc., Chicago, Illinois.

catalogues—one titled "How to Obtain a College Degree by Mail," and the other, "The Directory of Colleges Offering Courses and Degrees by Mail."

One of the schools mentioned in these books is called "The United States University of America." It mailed information to us from a location in Washington, DC. The logo for the United States University of America also includes, in small print, high-sounding words in Latin. Very official! We checked the address of the United States University of America; it's the office of Sincerely Yours secretarial service—a telephone answering service. When we called them they said that last December they had stopped taking calls for the United States University of America. Yet we received this application just last week when we wrote to them. Despite numerous attempts, we were no. able to reach the University of America.

With us is Lyn Gubser, Ph.D. Dr. Gubser is director of the National Council for Accreditation of Teacher Education in Washington, DC. A master's degree from the United States University of America, we are told with this information, costs \$1,500. Is this necessarily unusual?

Gubser: Neither the cost is unusual, nor the fact that you can get such a degree through the mail. As a matter of fact, in education alone last year we estimate that some 18 percent of the doctorates that were given in school administration and other educational areas were from what many people call "diploma mills."

Donahue: What do you know, if anything, about the United States University of America?

Gubser: I've talked to the commissioner of the District of Columbia office that investigates such things. I was told by them that this organization has been turned over to Washington officials for investigation and possible action.

Donahue: The presence of this facility in Washington, DC, can be very deceiving. Consider the case, for example, of a foreign service officer or employee from another country who may be only somewhat proficient in English and who sees the possibility of getting a degree from the "United States University of America." If I were from Argentina, I would be very impressed.

Gubser: As a matter of fact, the 18 percent figure I quoted was for domestic degrees alone. Yet we know that many of these institutions are acquiring most of their resources and many of their students from abroad.

Donahue: Who is watching this?

Gubser: Education has been constitutionally reserved to the states. Different states enforce their laws differently. Across the sunbelt, from Florida to California, one finds extremely lax consumer protection legislation regarding universities. Across the northern tier of states, one finds more stringent consumer protection legislation. So it's possible for an "Atlantic Southern University" to practice openly in one state, yet find itself censured in Washington State, where, as a matter of fact, its officers suffered punitive consequences for operating their diploma mill in Seattle.

Many of these institutions offer programs in a wide variety of fields, from civil engineering to prelaw, and veterinary science—a whole range of things.

Donahue: Did you ever close anybody down?

Gubser: We have participated with the attorney general's office in several states in actions that indeed have closed institutions down.

Donahue: Can you give me an example?

Gubser: Yes. I think a classic is the "University of Central Arizona," which was closed in April 1980, under a consent judgment in a Phoenix court. It's interesting to note what the judge in this case referred to as "illegal practices" in closing that institution under Arizona's consumer fraud act. He charged, first of all, that the University of Central Arizona used the term "university" when, in fact, it was not. It was nothing really but an office. Secondly, this "university" conferred various "doctoral" degrees when, in fact, these degrees "... do not signify the completion of a doctoral program under any recognized standards for doctoral degrees."

Donahue: It sounds as if Central Arizona University may be the tip of the iceberg. It also seems to me that those institutions that offer nontraditional educational opportunities would be the first ones to ensure that those bad apples are thrown out of the barrel.

Gubser: John Peterson of the Office of Private Postsecondary Education in California told me just yesterday that approximately 50 such institutions had indeed been closed in California over the last two years. Unfortunately, many of them opened up again under new names with new offices in different cities. Faced with problems of scarce resources, Peterson's office has difficulty even keeping track of them.

Donahue: This is only the beginning of an attempt to examine non-traditional education degrees for sale. In Part II we will talk with the officers of two so-called "nontraditional" universities—both of which happen to be located in California. We'll examine not only their catalogues but their campuses. And we'll talk to officials from those institutions to find out what, in fact, is required for not only a master's, but a Ph.D.—not to mention a baccalaureate.

Part II

Donahue: Given the increasing number of so-called "nontraditional" educational institutions, we can at least ask Dr. Gubser how many of these institutions are being monitored, what is the worth of the degrees that they are offering, and how hard does one have to work to get one?

Gubser: Many students who spend thousands of dollars on degrees sometimes don't get them back in the mail, and frequently when they do get them, they cannot use them for anything because these degrees don't meet any requirements for employment, for certification, or for licensure in a number of areas. It is indeed a situation where the "buyer must beware."

Donahue: Those people may be competing with others who have a degree from a so-called "traditional" university for which they

may have worked very hard and with which they may still lose a job to another person who got a degree on the phone.

Gubser: The ultimate problem here is that we are being faced with the counterfeiting of the "coin of our academic realm," with the same kind of results that occur when money gets counterfeited.

Donahue: Our purpose now is to examine two so-called institutions of "nontraditional" education.

COLLEGE DEGREE FOR XMAS

Challenge a B.A./B.S. degree by examination in N.Y. on Dec 19, 20, 21. (Fri. noon - Sun. noon.) Candidates with substantial credits should rush: letter of application, detailed resume, \$75 application fee and refundable \$500 tuition deposit for:

Bachelors Challenge Exam Program,
CITY UNIV. OF L.A.

1111 Wilshire Blvd. Los Angeles, CA 90017
or telephone 213-481-0950

This ad appeared recently in the *New York Times*, placed by the City University of Los Angeles. It encourages those who want baccalaureate degrees to send a \$75 application fee and a \$500 tuition deposit to the Bachelor Challenge Exam Program at CULA.

Or, consider the catalogue of the City University of Los Angeles (see Figure 1). Like many other college catalogues, there are photos on the cover that on first glance look like a campus. But these buildings include the Mark Taper Forum, the Atrium and United States Federal Building, and the building on the bottom, as anyone from Los Angeles knows, is the Dorothy Chandler Pavillion!

The actual City University of Los Angeles is located in a building along with at least a dozen other companies, including a credit collection agency and an acupuncture clinic. The

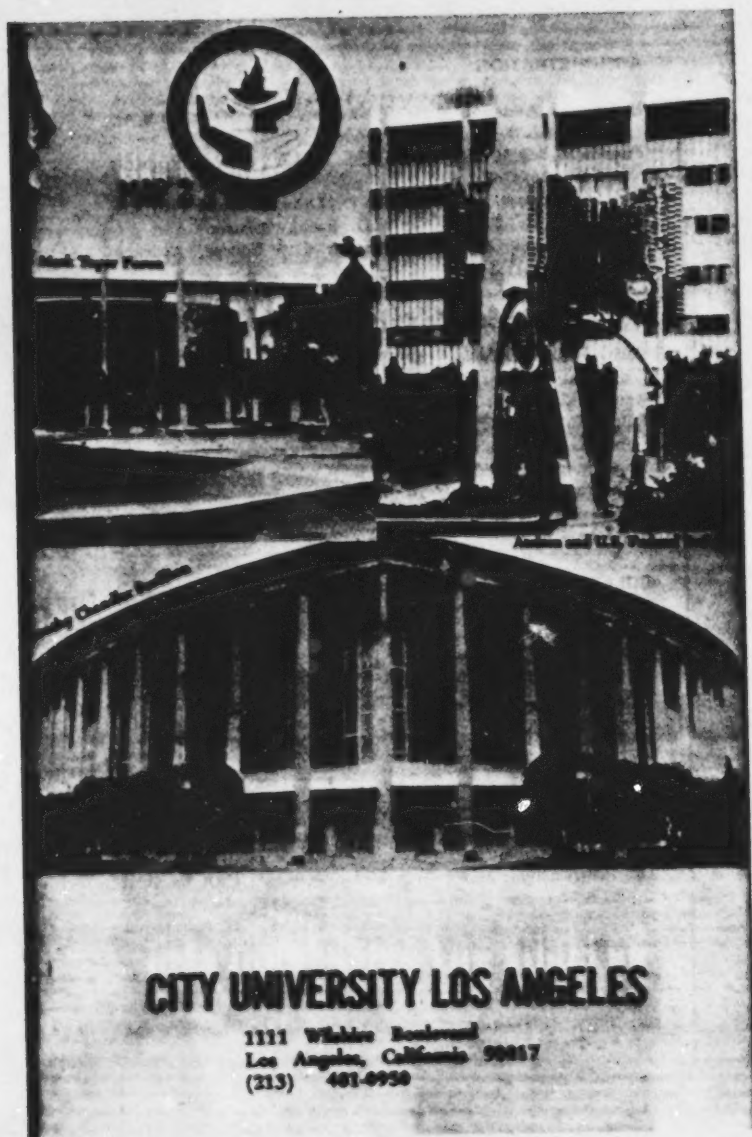


Figure I: Cover of the catalogue of the City University Los Angeles.

"University" offices are actually located on the second floor, in an office right in the corner.

Now the point should be made that the City University of Los Angeles is—as far as we can determine—legal. They can at least, however, be accused of somewhat deceptive advertising. Would you plead guilty to that charge, Vannoy Thompson, Ph.D.—you are the dean of admissions of the City University of Los Angeles. You have to be just a little self-conscious about a catalogue that features the Dorothy Chandler Pavillion on its cover.

Thompson: I do not plead guilty to false advertisement. We state that we are a university without walls, and for us to show America the Dorothy Chandler Pavillion, for which all of us paid taxes to put there, I don't think is a deception whatsoever! We send our address out with our catalogue—1111 Wilshire Boulevard—and we do not say "Address: Dorothy Chandler Pavillion, downtown."

Donahue: What kinds of degrees do you offer?

Thompson: We offer the bachelor's, the master's, the doctorate, and also a law degree. We have a law school, also, which is authorized by the Committee of Bar Examiners in the State of California.

Donahue: Is it possible for me to get a degree from your institution without ever going to your office?

Thompson: It's not probable that you can do so.

Donahue: But it's possible?

Thompson: I doubt it. It is not likely that you can get it. I doubt it seriously.

Donahue: OK, but you're not sure?

Thompson: Oh yes, I'm sure. You will not get a degree from us without coming to see us.

Donahue: You're saying then that everyone who receives a degree from the City University of Los Angeles has at one time or another

encountered—personally—at least one of the professors that is teaching the program?

Thompson: Either the student comes to us, or we go to the student.

Donahue: When you say you go to the student, an agent of your institution goes to the student?

Thompson: Yes.

Donahue: That agent may not be from your central office? It could be someone hired by you in that geographical area?

Thompson: Yes. We have extensions throughout America.

Donahue: Your letters are "CULA," which is awfully close to UCLA?

Thompson: It may be awfully close, but if a man knows his alphabet, he knows that it is not exactly that.

Donahue: Accompanying the confusion that goes with the juxtaposition of your letters and the deceptive cover of your catalogue. . . I want you to say "Well, maybe for the honored tradition of higher education, this is not very becoming."

Thompson: Well, I want to say to you about "higher education" that there are many holes in higher education that are not becoming. We have out in California a hundred or more students who I'm investigating now who walked through some of your "major" universities, got their degrees, and can't read nor write! I'm talking about athletes who set the turnstiles for your big universities—and I'm not going to call their names—just so that their administrators can go to the bank on Monday morning. We do not carry that type of deceptive goal because we don't have a football team or basketball team or baseball team to fill chairs for us. We're proud our institution's not operated on public money.

Donahue: We looked into one more so-called "nontraditional" university. "Columbia Pacific University," which is also located in California.

Meet Richard Crews, M.D. Dr. Crews is president of Columbia Pacific University. You take into account "life experience" when you consider a candidate's application for a degree, right?

Crews: The awarding of credit for life and work experience, I think, is a very important aspect of modern, nontraditional education, and it's certainly not unique to Columbia Pacific University.

Donahue: What would you say to that Ph.D., to the person who holds the doctorate, who says, "Why should I have to compete with your people when I worked all those years, did all those dissertations, all the orals, those bibliographies, all the spelling, the theses, the typing, the night school, the nerve-racking tests, and now I'm being asked to compete at an equal level with your men—and women—who may have graduated by getting a degree on the phone?"

Crews: The individual who went through a traditional institution may very well not have worked on problems that were nearly so applicable to his total education and to his profession and so on.

Part III

Donahue: Our examination of so-called "nontraditional" education continues with a look at Columbia Pacific University. On the inside of the university catalogue's front cover is a map of the north and south campus. Now the north campus, according to the catalogue, is located in Petaluma, California. We contacted the Petaluma city clerk and the Petaluma post office—neither had ever heard of Columbia Pacific University. However, a Petaluma postal carrier delivered mail to the man listed as the school's dean of faculty.

We followed the mail carrier's directions and found a mailbox on which were the letters "CPU," along with some old buildings and some others under construction. We also called the "university" several times. They would not give us the location of their north campus. It was only a seminar center, and there was nothing there to visit at this time, they said. The university's south campus, as indicated in the catalogue, is located in Mill Valley, California, on Shoreline Highway. There is an office building at that address, housing, among

other places, a holistic counseling association and an outfit called "Moments Pause," which is a hot tub, sauna, and a massage center, and an office—of Columbia Pacific University.

Columbia Pacific University is *not* illegal and, in fact, according to its own catalogue is authorized to grant degrees by the State of California—not to be confused with *accredited* to do so—which is unique to California. You can be "authorized," and then the next step is "accredited."

Meet Richard Crews, M.D. Dr. Crews is president of Columbia Pacific University, Mill Valley. How do you feel about our film report here, which makes it look like you also are guilty of deceptive advertising?

Crews: Well, with regard to the north campus, which is actually in Morrin County near Petaluma, I think your pictures don't show the seminar centers, the offices, and the library that's there. They were taken from the road. There is a considerable outlay of buildings there.

Donahue: Are you saying there's a library at that location?

Crews: Yes.

Donahue: Housing how many volumes?

Crews: It's somewhere in the range of 8,000 volumes. It's a small library. It's specialized in accordance with our philosophy, which we call "holistic," that is, fields are integrated and the various areas of an individual's life experience belong together and are related so that the library focuses on those aspects, for instance, of architecture, of business, and so on.

Donahue: Dr. Crews, you present on the back of your catalogue a photograph of Columbia Pacific University and this is identified as the "administrative center." What this actually is is an office building in which you have an office.

Crews: That building is our office in Mill Valley.

Donahue: The suggestion of this photo, very well-placed on the back of your catalogue, is that the entire building houses the scores of administrative and educational personnel over-

seeing Columbia Pacific University! That's not true at all! This is an office building in which you have *one* office!

Crews: Well, there are 16 office areas in that, and we have, I believe, 12 of them, and there is one other organization that has office space in that building.

Donahue: The manner in which you present your university does not speak well for you. We are to be understood for wondering how valuable and how truthful is the other information in this catalogue regarding the degrees that you are offering?

Crews: I think probably you have reviewed our faculty list. You're familiar with my credentials and—

Donahue: You're an M.D., medical doctor?

Crews: Yes, I graduated from Harvard. I'm a psychiatrist, and I've been in academic administration and teaching for quite a number of years.

Donahue: What do you think, Dr. Gubser?

Gubser: Well, I have a real problem using the term "nontraditional" to describe this kind of diploma outfit! Frankly, the term nontraditional is, I think, being misused. They do not use nontraditional titles for universities, nor do they use nontraditional titles for their degrees. These are all part of a package to make it look like these institutions are turning out people who indeed can compete with those who come through so-called traditional programs. I think we have to examine the fact that many institutions now have nonresidency programs that are clearly accreditable—and credible!

Donahue: "Columbia Pacific University." There is a Columbia University, and there is a highly regarded University of the Pacific in California. And now your "Columbia Pacific University!" I assume that if I tell someone I graduated from Columbia Pacific University, they are going to be impressed! Can I get a degree from Columbia Pacific University without ever going to CPU?

Crews: Yes you can, if you are qualified, and if you present documentation to us of your qualifications and complete the academic work which *can* be done at a distance.

Donahue: How much would a Ph.D. be from CPU?

Crews: The total tuition costs and university expenses are in the range of \$2,000.

Donahue: I assume you feel the same way, Dr. Thompson? You stand by not only the faculty, but the degrees that you are awarding? And you're proud of your student body—your alumni?

Thompson: Our student body is 100 percent successful. We have no graduates from CULA who are out of work. I can understand that traditional schools *fear* somebody cleaning up their dirty linen for them, and that's what we're doing. We are cleaning up the dirty linen for a lot of accredited institutions who are turning out *idiots* to go out into the public—

Donahue: With very little time left, Dr. Gubser, it does appear as though, first of all, the governmental business of overseeing or accrediting institutions of this and other kinds is rather uneven, scattered, hodgepodge, that standard criteria are not being used, and I assume that accreditation is offered with varying enthusiasm around the country?

Gubser: I think there is a good point that needs to be made here. The institutions that we've heard from today qualified for California approval primarily by meeting two criteria: they had to show \$50,000 in assets, and they had to show a "potential" for providing instruction. Those are two—I guess we could say—"flimsy" criteria that would allow many organizations to claim to be "universities."

Donahue: Obviously, some of the questions we have to ask ourselves are: Who is teaching my children? From what institution did that teacher get his or her degree? Who's building our bridges if degrees in civil engineering are offered? With time only to thank Drs. Thompson and Crews—incidentally, your M.D. is from Harvard? Where is your Ph.D. from, Dr. Thompson?

Thompson: UCLA.²

Donahue: UCLA. Not to be confused with "CULA?"

Thompson: Well, it's a good confusion.

Donahue: Lyn Gubser, Ph.D., director of the National Council for Accreditation of Teacher Education, where is your Ph.D. from?

Gubser: The University of Oregon.

Donahue: This is Phil Donahue in Chicago, now back to the *Today Show* in New York.

²In trying to verify Vannoy Thompson's credentials, AASCU learned that Mr. Thompson has asked UCLA not to make them available to the public. Upon contacting Harvard Medical School, AASCU was told that Richard Crews earned his M.D. in 1963.

STOPPING FRAUD AND ENSURING QUALITY

Lyn Gubser, Director

National Council for Accreditation of Teacher Education

Introduction

Issues of quality and competency in American education today have captured the attention of the public to a degree probably unprecedented in our history. Many factors have contributed to this heightened awareness. The consumer movement has caused each of us to appraise more critically the products we purchase, including education. Recession requires us to question the return on each tax dollar spent. Increased costs of maintaining educational systems have caused the basic purposes of these institutions to be re-examined. In the minds of many, a paramount reason has been that the American press, controlled by a handful of corporations existing within a few New York City blocks of one another, has preyed upon controversy in American education in order to sell more newspapers and broadcast advertising time.

We have made incredible progress in all of public education in the last two hundred years. Our modern successes would have seemed incomprehensible to our forefathers. Today a higher percentage of citizens attend college in this country than in any other nation on earth. The American educational system is, throughout the world, more respected than that of any other nation. A degree from an American institution is internationally respected as the *sine qua non* of educational quality, especially in developing nations. American universities, through continuing education and extension programs, have reached more people in a greater diversity of fields over a longer period of lifetimes and with higher levels of success than has ever been attempted, yet accomplished, by any other nation.

For every action, however, there is a opposing reaction—although this time we hope not an equal one. As we have provided advanced degrees to more people, we have concurrently devalued the worth of each individual degree. As we have made education immediately available to more working professionals, easy access has made that training less treasured.

We have become such a credentialed society that even the lesser among shopkeepers now holds an MBA and is considering a doctorate in accountancy. We have required advanced preparation of teachers to the extent that educational specialists have had to create their own degrees. We have created a situation in which a diploma to many is but a union card for employment. It is not much appreciated, nor valued, as an indication of intellectual or professional accomplishment. It is at this point, where degrees and credits are taken for granted as vocational necessities with little academic value, that we find abuses begin.

We wish herein to address three areas of concern that, although fundamentally related, may call for somewhat different responses from the academic community and the consuming public. The first issue relates to clearly fraudulent institutions as well as submarginal or barely marginal institutions that come close to the popular label "diploma mill." The second area relates to programs of legitimate institutions offered off-campus, without adequate quality controls, that may directly call into question the integrity of the institution as a whole. The third issue is a relatively new one. It relates to quality assurance with respect to the growing use of new telecommunication techniques that extend colleges and universities beyond campus, state, and regional boundaries.

Dealing with Fraudulent and Marginal Institutions and Programs

That element most destructive to academic credibility has been the more than 50 "diploma mills" that turn out "quickie degrees" for those who want instant credentials. Generally state-licensed as small corporations, most diploma mills are simply small offices in large cities. Some are only telephone answering services or post office boxes from which can be purchased official-appearing credentials. Increasingly, to avoid consumer fraud actions, diploma mills are requiring some academic work—usually projects or papers of little rigor or questionable originality. A doctorate, for example, was recently awarded by a California operation to a New Jersey woman who had spent two months logging, without analysis, broadcasts of *Sesame Street*.

A few marginal institutions require "residency,"—usually two or three weeks at a regional motel spent in "exchanging invaluable professional ideas," to quote a current brochure. Explains a chief administrator of the Philadelphia school system about his four-week "residential" doctoral program:

The work is there, but it is all concentrated. I was in the pool at 5:00 p.m. daily. But from 8:00 a.m. to 4:30 p.m., I was in school. And even around the pool we talked business. It wasn't a vacation.¹

Most of the larger operations require no coursework, nor written reports. They depend on the accumulation of "life experience credits" that clients can buy in sufficient quantity to earn a degree. One Florida operation provides a bachelor's degree in four months to anyone with a prerequisite \$3,085 for the required number of life experience credits.

Generally, diploma mills and marginal institutions offer primarily graduate degrees, although an increasing number are entering the baccalaureate trade. Quickie degrees are available in business administration, management, engineering, psychology, accounting, and computer science. A few have provided bachelor's in education with which candidates have acquired state teaching certificates. A case in point is St. Stephen's Education Bible College, operated out of a church basement in Los Angeles.

Well over 100 California teachers have bachelor's or master's degrees from "St. Stephen's." California authorities "strongly suspect" that over 40 teachers licensed through St. Stephen's may never have had *any* college work. They do not expect action to be taken against employed teachers who possess bogus degrees because there have been no complaints and "no one can demonstrate that teachers from St. Stephen's are any different from teachers from anywhere else," says California teacher certification officer Lee Huddy.

Programs providing doctorates in school administration have proved to be particularly popular offerings of transient institutions. Especially marketable are degrees designed for persons who occupy positions as school superintendents. Despite increased requirements of the superintendency, many states demand no particular educational achievement. In some states, local superintendents are still publicly elected.

When pressed for proof of substance, entrepreneurial schools quickly cry the "king's X" of being "nontraditional." Yet despite this disdain for the traditional, they are all too anxious to employ customary academic titles and nomenclature. All have "professors," whether or not these have any bona fide academic credentials. The degrees they do possess have frequently been awarded by themselves from their own institutions. All give

¹ *The Philadelphia Bulletin*, Philadelphia, Pennsylvania, September 24, 1978, p. A-1.

traditionally-titled "master's" or "doctoral" degrees. Especially insidious is the use of the term "university" in the title of most of these so-called nontraditional operations.

Webster's Seventh New Collegiate Dictionary defines "university" as

an institution of higher learning providing facilities for teaching and research and authorized to grant academic degrees; specifically one made up of an undergraduate division which confers bachelor's degrees and a graduate division which comprises a graduate school and professional schools, each of which may offer master's degrees and doctorates.

Clearly, by this accepted definition, a typical "nontraditional university" is neither nontraditional nor a university. Most do not have "facilities for teaching and research," nor are they "authorized to grant academic degrees." They are not divided into "professional schools," and usually consist of no more than a one- or two-man office. They often select names that suggest church or state affiliation: "St. John's University" (a New Orleans operation, not the esteemed institution in New York), "St. Stephen's Education Bible College," "The University of Central Arizona," "Hamilton State University," or "Western Colorado University" (located in Grand Junction, not to be confused with Western Colorado State, located in Gunnison).

Names implying state approval, and hence state regulation, would appear to be titles that no state would permit to be used. But many states have no licensure nor regulatory laws that govern universities. An institution of higher education can operate in these states and award any degree, including the doctorate, upon filing articles of incorporation with the state corporation commission.

Individuals come into states having lax regulatory laws and set up mail-order programs that grant "quickie" doctorates. By providing false transcripts and other credentials for their graduates—even to the point of phony campus parking stickers—these operations are able to place their graduates in direct competition with those who have completed legitimate programs in business and industry, government, and the professions. For example, in closing the University of Central Arizona under Arizona's consumer fraud act, the attorney general's office located recipients of false doctoral diplomas in schools, administrative, and governmental positions in 26 states from Washington to Massachusetts.

The number of individuals receiving false credentials is difficult to estimate, although some data are available. In 1979-80, approximately

6,000 regular doctorates in education (both Ph.D. and ED.D's) were awarded by regionally-accredited American institutions. This same academic year, an estimated 1,350 quickie degrees were granted by unrecognized operations—roughly 18 percent of the total. The number of phony credentials awarded in education, however, appears to be declining as these operations turn increasingly to the more popular fields of business administration, computer science, and engineering. No data on the number of "graduates" in these academic areas are yet available.

Quickie degrees are a lucrative business. For 1979-80, the last year for which figures are available, gross revenues reported by even the smallest diploma mill was \$65,700 for a Florida mom and pop operation. Out of 49 others reviewed, with one exception, revenues were in the \$100,000 to \$300,000 range.

The solution to the problem of diploma mills lies in improved state licensure of colleges and universities. Unfortunately, improvement in this direction has been slow and painful. Fearful of unnecessary state interference, many legitimate institutions have fought the passage of statutes that would place more stringent requirements on the operations of institutions calling themselves colleges or universities.

In many states, officials argue that they do not have sufficient personnel or resources to enforce even existing laws. In California, for example, the office responsible for periodic evaluations of marginal institutions has been unable to conduct adequate reviews for the past three years because of a lack of funds. There has been no review of the performance of operations even where complaints have been received from both the public and press.

Efforts to regulate diploma mills have also been hampered by officials who hold "nontraditional" degrees or actually operate the very outfits they are expected to regulate—a situation Delaware's *Wilmington News-Journal* says is "like asking a priest to referee a Notre Dame football game." In the case of one southern diploma mill being investigated by the National Council for Accreditation of Teacher Education (NCATE) in cooperation with NBC News, one of the judges of the superior court in which a consumer fraud action might have been brought turned out to be the "president" of the "university" under investigation.

It's an application of Gresham's Law, but instead of bad money driving out good, bad credentials greatly reduce the credibility of legitimate ones. Leaders of legitimate, respectable institutions must be more than alert to the problem. They should become actively supportive of efforts to strengthen state licensing laws and work to provide sufficient fiscal resources that state agencies responsible for regulating institutions will have the necessary money to do so.

Legitimate institutions would also do well to support stronger links between completion of accredited programs and eligibility for state licenses and certification, which of course runs against their natural inclinations. Where individuals completing programs that are not nationally or professionally approved have easy access to state licensure, few but local constraints are ever placed upon the quality of programs that prepare them. Occasionally, as in the case of St. Stephen's Education Bible College, there may be no constraints at all. Insistence upon full accreditation as a prerequisite for licensing in all fields is a small price to pay for reducing the risk of counterfeit credentials and academic fraud.

Empty Credits for Worthless Coursework

As enrollments on campuses throughout the nation slid into recession in the late 1970s, many innovative institutions began to develop new delivery systems to provide continuing education and extension coursework beyond the traditional service areas of their campuses. For the most part, coursework delivered on military bases throughout the world, overseas dependent schools, and from coast to coast in the United States and Canada provided servicemen, teachers, and businessmen with unprecedented access to continuing higher education.

Abuses have occurred. The quality of instruction has seemed to diminish in direct proportion to the distance of a course from campus support and supervision. To make matters worse, the cottage industry of credit brokerages has emerged to arrange for credit transactions with industries, school districts, and the military. Representing several institutions, these brokerages have no allegiance, hence no responsibility, to any particular campus or client. They are in the game for a percentage of the take. The more they sell, the more they make—irrespective of the quality or propriety of coursework offered. It is no longer uncommon for persons reporting to be from one institution to provide credits from some other, frequently to the surprise of enrolled personnel.

Such abuses were highlighted in the 1980 college athletic scandals. Last year the attention of the public and higher education community was captured by such headlines as "Credits for Sale," "College Credits Easy Enough for Four-Year-Olds," "System Invites Abuse in Teacher's

Scramble for Credits," and "Dubious Extension Programs Help Teachers Raise Pay."²

Dozens of athletes have been disciplined by the National Collegiate Athletic Association for receiving university credits without completing appropriate coursework. And the press was quick to note that in addition to athletes thousands of others were enrolled in bogus courses, seeking credits for salary advancements, state licenses, promotions in rank, or better jobs. The majority of those enrolled in bogus courses may appear to have profited, yet college athletes have been punished and reverberations against the integrity of institutions of higher education have yet to cease, harming us all.

Analyzing the characteristics of those institutions that have abused academic propriety in extension course operations provides several clues to how this regrettable situation might be corrected and controlled. First, the leading offenders have generally been colleges with campus enrollments of fewer than 1,000 students, yet boast off-campus enrollments of over ten times that number. Their main operations are located in states from Oregon to Massachusetts, but most have few extension offerings within their home states. These institutions generally rely upon personnel of local districts or on military bases to instruct their own colleagues for minimal recompense, keeping overhead low and profits high. Credit is often offered for in-service programs sponsored by school districts or corporations and provided as an add-on gimmick to boost employee attendance. Some marginal institutions have even offered cheap credit deals to entice individuals to enroll in enough of their nontransferable courses that students will eventually feel compelled to complete an entire degree with that particular school.

A fundamental characteristic of institutions offering academically cheap extension credit is that they have almost never had or have lost national, specialized accreditation in the areas in which they offer questionable extension programs. For example, the bulk of coursework in which athletes were enrolled during the recent college athletic scandals was in education. Yet not one of the nearly 20 institutions cited for offering empty extension coursework was nationally accredited. Two of the major offenders had been denied accreditation because of a lack of professional control of off-campus programs.

The agility institutions have demonstrated in moving from state to state, or even nation to nation to peddle their extension wares makes

²Headlines from respective 1980 news stories appearing in *Newsweek*, *Chicago Tribune*, *Portland Oregonian*, and *Sacramento Bee*.

regulation through state licensure laws nearly impossible. Even where state laws have been brought to bear, results have been disappointing. Operators of one Los Angeles credit brokerage, faced with the probability of indictments for fraudulent practices, left California only to incorporate as a university in Arizona. They are now back in California running the same irregular operations for which they earlier got into trouble. Authorities have thus far been frustrated in their attempts to control this institution, which—incidentally—recently opened a branch operation in Plymouth, Massachusetts.

The problem of empty credits and worthless extension coursework is a difficult one to solve, for no single agency nor group has all of the pieces of the puzzle. Accrediting agencies, representing professional peer review, can accomplish much if the same accreditation criteria are applied to extended programs as are applied to on-campus offerings. This requires that institutions keep records on extension activities that speak to quality as well as quantity. It demands that evaluation teams review these data and verify them with on-site reviews of extension programs—where their size and scope warrant.

Those accrediting associations whose standards have been developed around a systems model have generally found it easier to evaluate extension programs. NCATE's system, for example, is based upon a review of inputs (course objectives), such factors as students admission criteria, faculty, curriculum, and resources that represent the structure, and the evaluation of outputs (program graduates). The evaluation of outputs suggests modifications for inputs that completes the cycle and the system.

Such a systematic organization of standards is as applicable to off-campus, so-called nontraditional offerings as it is to traditional programs. In the final analysis, irrespective of where they are located, academic programs require much the same support, maintenance, evaluation, and continuing modification to sustain their vitality. All too frequently the term "nontraditional" has been used as an excuse for failing to meet these basic requirements and a justification for operating programs of questionable substance.

In addition to supporting specialized accreditation's review of extended offerings, institutions can do much to protect themselves from falling into situations that can lead to shoddy extension offerings. First, they should not offer extension coursework at a level beyond which they offer programs on their own campuses. Ordinarily, they should not offer programs through extension that are not regular campus offerings. Currently, a large number of institutions are offering extension programs in special education and clinical reading that are not provided on their home campuses. If they do not have sufficient faculty or resources to offer these

programs at home, how can they sustain them hundreds and even thousands of miles away?

Institutions should either use regular faculty to instruct in extension courses or employ faculty with credentials equivalent to campus-based instructors to do so. They should not permit, let alone recruit, instructional personnel from among the target group to conduct classes for colleagues and peers. Similarly, institutions should steer clear of credit brokers whose moral if not legal status is clearly questionable. Frequently, brokers deal in *ex post facto* credit arrangements that defy institutional review or control.

At no time should institutions permit their academic credit to be used as a gimmick to bolster meeting attendance or attract conference participants. Any rigor that academic credit might imply is directly counter to its offering as an enticement. Even though such credit may seem to offer impressive short-term profits, in the long run the damage to the institution's reputation and integrity will hardly be worth the money earned. Development officers and public relations officials of those institutions caught up in the credit scandal will attest to the fact that for these institutions their willingness to sell cheap credits for a fast buck turned into some very expensive long-term losses.

Internally, institutions can do much to provide checks and balances to ensure that appropriate quality controls are maintained on all extension offerings. Establishing and meeting objectives of the institution's continuing education and extension programs is one way to set criteria for squaring extension offerings with an institution's mission. The greater the participation of academic administrators in developing and maintaining an organized extension program effort, the more probable the maintenance of academic quality. Catch-as-catch-can extension offerings usually champion the earning of money as the primary purpose for extension offerings. An extension program without academic rationale lends itself easily to abuse.

Such practices as placing unrealistic pressures on deans of continuing education to show profits "or else," or requiring that faculty of enrollment-poor departments make up a quarter of their assignments by drumming up extension courses do not promote conditions conducive to the maintenance of quality in extension offerings. In dealing with problems of low enrollment and financial austerity, there are many alternatives preferable to lowering standards of quality of instructional offerings and hence tarnishing the integrity of faculties and institutions.

Quality Control in the Instructional Space Age

Education stands on the threshold of immense technological influence and change. Computer-assisted instruction, communication satellites, instructional television and holography, videodiscs, home learning centers, in fact a plethora of new technologies will mean more education and less schooling for all of us, irrespective of age. Already, many institutions are making use of television to broadcast extension coursework throughout their regions, and a few throughout the nation. Two-way telecommunication systems are now available that allow students to question lecturers and in turn be questioned. Mediated television lectures by major professors, with recitation and discussion sections conducted live by teaching assistants, have proved especially popular. At times, these extension offerings have taken on most of the characteristics of the traditional lecture class and not infrequently have improved upon them. Occasionally, as in the case of computerized instruction, extension programs may offer one-on-one instruction between the institution and a servicemember teacher, or corporate employee. For several years now, the major portions of select technical and business degrees have been offered via computer through the University of Arizona to companies having compatible hardware for computer telephone linkages. The result has been both audiovisual and printed two-way transmissions of information that allow students to proceed at their individual pace and convenience through a broad range of curricular offerings.

While such innovations offer immense opportunities to all of us in higher education, mediated instruction poses unprecedented challenges in quality control. How can we verify, for example, that a student who receives credit and grade is the same person who completes the work? Already, we have examples of companies where certain employees have taken computerized examinations for their coworkers for a considerable fee.

How can we ensure that the quality of high-tech courseware can be maintained, particularly when much of the software may be developed by computer engineers inadequately familiar with subject content? While companies may be adept at programming coursework, programmers may not have the curricular knowledge or understanding of instructional techniques to present information with optimal effectiveness. Although the gap between technician and instructional specialist should narrow in the years to come, some current courseware leaves much to be desired. Institutions should be very cautious for the present in equating computer-assisted instruction with that accomplished through traditional approaches.

They must also be prepared to play a greater role in comparative evaluations of coursework taken in traditional modes with that offered through technical approaches.

Maintaining the integrity of a profession, business, or institution is never a simple matter, for organizations tend to adopt, if not magnify, the human qualities of the people they comprise. The underlying anti-intellectual attitude of Americans, as carefully chronicled by Richard Hofstadter, combined with declining enrollments and fiscal retrenchment in higher education, create an environment threatening to the survival of academic standards and quality. It is imperative that during these hard times we not let entrepreneurial interests overshadow our educational purposes, causing us to prostitute for short-term profits our tradition and future.

QUALITY ON CAMPUS: WHOSE RESPONSIBILITY?

Richard M. Millard, President
Council on Postsecondary Accreditation

The primary responsibility for institutional integrity and quality assurance ultimately rests with the individual programs, institutions, or governance systems in higher education. There is no way that any association or agency can bestow integrity or quality on a program, institution, or system. The assumption that it can bestow, create, enforce, or impose integrity and quality on a program or institution that is not already committed to such objectives is an interesting form of self and social delusion. This means that the primary commitment to educationally sound objectives and effective means of obtaining them rest with faculties, administrations, trustees, and, yes, I would add, students and alumni. If programs and institutions will not accept this commitment and responsibility, no one can accept it for them.

This may sound like rank heresy from someone who previously played a role in encouraging states to develop more effective legislation for authorization of institutions to operate and grant degrees and who is currently deeply involved in working with accrediting associations, national higher education organizations, and institutions to strengthen accrediting standards, processes, and procedures. If one looks more closely, however, I believe one would discover that it fits in with what accreditation is all about and why effective state authorization and licensure laws are crucial to the health of the academic community itself. The key to this lies in the fact that (1) there are certain parameters within which self-regulation takes on meaning and without which higher educational enterprises are jeopardized by their less-than-scrupulous imitators; (2) communal self-regulation at least in part is a function of the commitment of the individual institutions and programs to the communal self-regulation process; and (3) granted external negative pressures, the mutually reinforcing effect of committed institutions through their communal self-regulatory accreditation activities constitutes a major resource for preservation and

enhancement of quality during a period of fiscal stress and increased public demand for accountability.

What all this does, however, is underline a progressive series of responsibilities that rest with institutions and programs individually and collectively. Suppose we try to spell out what some of these are.

Role of the States

At the most fundamental level, the primary responsibility for stopping outright fraud and abuse, for preventing diploma mills from coming into existence or putting them out of business when they appear does or should rest with the states. There is little or nothing that legitimate accrediting associations can do about such institutions. Institutions must exist before they can become candidates for accreditation. Accreditation is at least semivoluntary and most such institutions never apply. To be sure, some of them actually create their own bogus accrediting associations which, in turn, seldom seek recognition by the Council on Postsecondary Accreditation (COPA) or listing by the Secretary of Education. All institutions, however, have to be incorporated, licensed, or authorized in the states in which they exist.

In relation to fraudulent or submarginal institutions, the states thus have the initial opportunity for exercising control and for stopping their operation. The major catch is that there are still some ten states without authorization or licensure laws, where all it takes to start a so-called educational institution is incorporation through the secretary of state. Even among those states with authorization laws, the laws themselves vary considerably in their effectiveness. Some states have strong, well-enforced laws; others have weak laws with minimal enforcement; and a few states with strong laws do not provide the personnel or the funds to enforce the laws adequately.

Not only fraudulent but submarginal institutions contribute to undermining the credibility of higher education as a whole. On October 30, 1981, the *Washington Post* ran a front-page article about a school in a southern state that lured 110 District of Columbia students for which a recruiter had been paid \$25 each on a bus to the school. The school promised "a new and exciting way for poor, high school dropouts and students with criminal records to get a college education." Five days later "at least half the D.C. students had returned home angry and disillusioned." The school is not accredited.

Obviously neither single legitimate institutions nor accrediting associations can do much about the particular school in question or others like it.

There is, however, something they can do together. They can work together in their own states and with their national higher education organizations to bring pressure to bear within the states to pass effective legislation and to provide funds for its enforcement.

Institutional Support of Effective Legislation

The first state model legislation to control diploma mills and submarginal institutions was developed in 1960 by the then National Commission on Accrediting and the American Council on Education. However, the time was not ripe for it, and it had little impact. Much more adequate model legislation was developed by the Education Commission of the States in 1973. It has had impact on some 27 states. But we still have a long way to go. The move to strengthen state authorization and licensure and to encourage adoption of the 1973 model legislation has had COPA's endorsement as well as most of the national higher education organizations, including AACSC. But such general endorsements by national organizations are not sufficient by themselves to get legislation passed. To do so requires united effort in particular states on the part of the institutions themselves in cooperation with other concerned groups in demanding and supporting appropriate legislation.

Unfortunately, segments within the higher education community have at times opposed rather than supported sound legislation on the grounds that it might extend state control and further erode institutional diversity and autonomy. It seems to me that such opposition is both misguided and counterproductive. The question at issue is not control of legitimate institutions nor is it substitution of state authorization for accreditation; rather, it is assurance of minimal conditions for legitimate operation. To be sure, such legislation needs to be watched to ensure that it is not something more than this. But the opposition of legitimate institutions to authorizing legislation raises basic questions about the real interest of the institutions themselves. Such legislation not only protects would-be students but legitimate institutions as well against unscrupulous competition on the one hand and against public suspicion that legitimate institutions may be engaging in related practices on the other. Such legislation does not create quality, but it ensures that operations without either the intent of or the potential for providing quality education do not come into existence or, if already in existence, cease to operate as higher education institutions. Authorization should not be confused with accreditation. In fact, almost half the states with authorizing legislation accept accreditation as evidence that institutions have more than met state authorizing criteria. In most of

the other states where accredited institutions are not exempted by law from authorization review (unless there is evidence of slippage or malpractice), accreditation tends to be taken as *prima facie* evidence that state standards have been met. Again, without such legislation neither the public nor institutions nor accrediting agencies have any means of preventing fraudulent and submarginal institutions from coming into existence, operating, and not only ripping off students but undermining some of the credibility of postsecondary education as a whole.

From this standpoint, legitimate institutions, accrediting associations, and national higher education organizations have a basic responsibility to work together in each state without authorization laws or with inadequate ones to support development and passage of such legislation and to encourage its adequate enforcement. I must add that the problem is likely to become more complex and acute with the rapid expansion of telecommunications and their potential for misuse as well as for positive use.

Role of Accreditation

But stopping fraud and inhibiting submarginal operations is only one end (and the dark end at that) of the spectrum of quality enhancement. If higher education is to regain, retain, and enhance its credibility (particularly in light of current fiscal pressures, variable enrollments, and increased demands for accountability), then far more than just combating the dark end of the spectrum is necessary. This next step is where accreditation as the communal self-regulation of higher education in assessment and enhancement of quality becomes crucial.

Accreditation, like the academic community of which it is a part, is under attack. Its critics, some within the academic community, argue that it is ineffective; that its standards are too soft; that because it involves peer review, it tends to be a back-scratching operation; that too many institutions and programs are accredited; that because accrediting reports are confidential, it is little more than a weak Good Housekeeping stamp of approval that is used primarily to blackmail presidents, trustees, and legislators for increased salaries, facilities, and funds; and that the major institutions who are in no danger of losing accreditation are indifferent or noninvolved, and so on. Some of these criticisms may have some foundation. Others may be the results of misunderstandings. But to the extent that they are partially true or believed to be true, they further weaken the credibility not only of accreditation but of the academic community itself.

Basic Facts About Accreditation

There are some basic facts about accreditation that members of AASCU know or should know well but about which all of us should be more frequently reminded. The first is that accreditation is not an external system run by "accreditors" imposed upon the academic communities and institutions. Accrediting associations are the institutions and programs plus responsible members of the professions who are their members. They constitute the communal voice or judgment of higher educational institutions and programs in their self-regulatory quality assessment activities. The staffs of accrediting agencies are universally small, and the overwhelming majority of the work is done by institutional and program representatives on a voluntary basis. This is the source of both their strengths and their weaknesses. They necessarily reflect the academic communities of which they are a part.

Second, accrediting associations grew out of recognized needs on the part of institutions and specialized programs (including professions) for effective quality assessment, control, and enhancement—a need for putting their own houses in order. They, like higher education, have gone through an evolutionary process reflecting changes not only in academe but in the wider community with its impact on higher education. They have at times been affected by the inertia and traditionalism of their constituent institutions and at other times by progressive movements in higher education that have been accelerated through the accrediting process. They are, however, a uniquely American phenomenon adapted to the diversity and semi-autonomy of higher education in this country.

Third, the standards used in the accreditation process are not determined from on high but are developed by the institutions and programs through their commissions and are under constant review and revision. The standards of 73 percent of the associations have been revised or adopted within the last six years; in fact, the standards of 54 percent of the associations have been adopted within the last three years. Over the past 50 years standards have on the whole moved from rigid quantitative input factors in quality assessment to evaluation of institutions and programs in the light of appropriate functions, objectives, and results. While more movement in some instances is necessary, at least the direction is clear. Some have charged that accrediting standards are weak because they are based upon assessment of the appropriateness of educational objectives and the effectiveness and ability of institutions to meet them. But this accusation fails to take into account the diversity of American higher education and the fact that quality can be expected and demanded in very different types of institutions fulfilling very different functions.

Fourth, accreditation as the communal vehicle for institutions' self-regulation will be only as effective as institutions make it. This means that its effectiveness requires acceptance of responsibility in the accrediting process and through accrediting associations not only by presidents but by faculties, other administrators, and trustees, in other words by institutions as a whole. The alternatives to accreditation as a primary means of quality assessment and enhancement are clear and are not in harmony either with institutional integrity or the principles of self-regulation.

Basically, accreditation is a means of assuring the academic community, the general public, and other organizations that an institution or program has clearly defined and appropriate objectives, maintains conditions under which their achievement can reasonably be expected, appears in fact to be accomplishing them substantially, and can be expected to continue to do so.

Institutional Support of Accreditation

What institutions and presidents can do to strengthen accreditation and with it the credibility of the academic community and the institutions and programs that make it up is rather clear.

First is to help to dispel on their own campuses and among the public the "we-they" distinction that involves the assumption that somehow accrediting associations are external bodies that harass campuses with unreasonable requirements. They are not "they" — they are "we", the academic community engaged in self-regulatory quality assessment and encouragement of quality enhancement.

Second is the acceptance of real responsibility for involvement in the accrediting process by making the self-study and peer review of accreditation an integral part of the ongoing self-assessment and planning process of the institution or program itself. Equally important is the responsibility to become involved in the operation of the accrediting associations and their activities. They are your associations. Their integrity is your integrity. It is important to you that appropriate faculty members and administrators be encouraged to serve on visiting teams and that you take part in the deliberations and standards development of the associations.

Third is maintaining consistency and support of the work of accrediting associations. One can hardly insist upon rigorous application of standards for other institutions and at the same time complain bitterly when they are applied at one's own institution. And yet, there are instances in which this occurs. There may even be times when an institution for the sake of its integrity or because of inadequate funding to provide program integ-

rity should discontinue a program. Closely related is the inconsistency of complaining about multiple accreditation visits when away from campuses, e.g., in Washington, but doing little or nothing about it at home when a dean or a department head feels otherwise. COPA and a number of the associations are working hard to encourage interagency cooperation and planned joint visits. But the request for joint visits must come from the campuses and in spite of rhetoric to the contrary some campuses in fact prefer the contrary.

Fourth is avoiding selective use of the results of accreditation, that is, the report of the accrediting body, for internal or external political ends. Accreditation reports can be used legitimately to underline or reinforce institutional problems and needs. But to use parts of reports as means of beating trustees or legislators over the head hurts both the institution and the credibility of accreditation. From the standpoint of credibility, it would be far better to make the full report public than to use it selectively to threaten funding sources. In fact, if the report is misused the association has the right to make the full report public. The whole issue of confidentiality needs review and is on the priority agenda for COPA consideration.

Fifth, and closely related to the first and the second, is helping to ensure that faculties, trustees, students, alumni, and the general public, including legislators and state agencies, become more fully aware of what accreditation is and is about, that they understand that it is the academic community's means of assessing and enhancing its own quality and not simply an additional drain on the budget. Here the stakes are extraordinarily high. What is at issue is whether with current growing conditions of stress such self-regulatory quality assessment remains in the academic community or whether quality control and regulation are passed to others. There are those on the outside who are doing more than just waiting.

Ultimate Responsibility for Quality: institutional Self-Regulation

Having said all this, however, I would like to come back to the point with which I started. The AASCU presidents can work together to help curb fraud and submarginal institutions through support of effective state authorization legislation and enforcement. They can and should work together to strengthen, reinforce, and promote the integrity of accreditation as academe's communal means of self-regulatory quality assessment and enhancement. These will help. But the ultimate responsibility for quality rests with the individual institutions and programs. Major deviations can be stopped or inhibited by authorization. Through accreditation,

institutional intent can be strengthened, quality enhancement can be encouraged, and other institutions and the public can be assured that institutions and programs are fulfilling their responsibilities. But ultimately the primary commitment to sound educational objectives and effective means of obtaining them must be made by the institutions and programs themselves.